

EXHIBIT 15

From: [Alex Frawley](#)
To: [QE Brown](#)
Cc: [Google Team](#)
Subject: Brown v. Google - Plaintiffs' Exhibits
Date: Monday, September 18, 2023 3:21:00 PM

Counsel,

In response to your request, here are the exhibits we ask that Google stipulate to being admitted, in exchange for Plaintiffs dropping these witnesses. We organized the exhibits by witness.

- **Adhya:** 66, 82, 83, 84, 98, 99, 102, 103, 109, 117, 125, 205, 208, 217, 271, 276, 283, 366, 367, 368, 435, 452-54, 458, 459, 604, 606, 654, 858
- **An:** 384
- **Bhatnager:** 113, 382-383, 420, 440, 537, 685, 697, 715, 820-21
- **Bindra:** 25, 63, 69, 72, 73, 77, 110, 111, 202, 227, 234, 272, 279, 287, 293, 295, 503, 564, 578-80, 587, 594, 596-97, 610, 623, 660, 700, 701, 702, 711, 716, 719, 825-26, 884, 934, 935, 943
- **Harris:** 48, 56, 58, 60, 62, 74, 81, 85, 104, 106, 120, 142, 222, 229, 257, 270, 274, 275, 281, 433, 502, 520, 684
- **McPhie:** 135, 146-201, 670-680
- **Monsees:** 52, 54, 57, 118, 145, 231, 246, 522, 536, 543, 590, 605
- **Sadowski:** 286, 810, 811

To be clear, any agreement to drop these witnesses is contingent on the parties successfully working through these issues and the Court approving any agreements we reach (for example, an agreement to admit a document without a sponsoring witness). Plaintiffs reserve all rights, including to still call these witnesses. Plaintiffs also continue to believe that Google should not be allowed to call McPhie or Sadowski.

Best,
Alex

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